

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
ST. PAUL DIVISION**

In the Matter of the Complaint of)
STEVEN SOMMER, Owner of the) Case No. 0:20-cv-02499
Motor Vessel "SOMMER WINE" f/k/a)
"RAGAMA" for Exoneration From or)
Limitation of Liability,)
Plaintiff.) In Admiralty

**[PROPOSED] NOTICE OF COMPLAINT FOR EXONERATION FROM
OR LIMITATION OF LIABILITY AND MONITION**

Notice is hereby given that STEVEN SOMMER has filed a Complaint pursuant to the Limitation of Liability Act, 46 U.S.C. §§ 30501-30512, claiming the right to exoneration from or limitation of liability for any and all claims, deaths, losses and damages allegedly arising out of an incident that occurred on August 7, 2019, in which Richard Bishop, Jr. was a passenger aboard "SOMMER WINE" f/k/a "RAGAMA", a 40-foot Pacemaker cruiser, built in 1976, with Hull Identification Number PAC40411M76F (the "Motor Vessel"), and fell or jumped into the Mississippi River from the Motor Vessel while the Motor Vessel was moored to the dock at Twin City Marina Dock C in Inver Grove Heights, Minnesota. Richard Bishop, Jr. died as a result of drowning and/or injuries sustained in the Occurrence. All persons or other entities asserting claims with respect to which the Complaint seeks exoneration from or limitation of liability are admonished to file them with the Clerk of the United States District Court for the District of Minnesota, St. Paul Division and to serve on Mark G. Pryor, Brown & Carlson, 300 Highway 169 South, #500, Minneapolis, MN 55426 and Shari L Friedman and William P. Ryan, Marwedel, Minichello & Reeb, P.C., 303 W. Madison Street, Suite 1100, Chicago, Illinois 60606, attorneys for the Plaintiffs, a copy thereof, on or before the 22nd day of February, 2021, or be defaulted. Personal attendance is not required. Any claimant desiring to contest either the

**EXHIBIT
A**

right to exoneration from liability or the right to limitation of liability must file and serve an Answer to the Complaint, unless such Answer is included in its claim.

Dated this ____ day of December 2020.

ENTER: _____
United States District Judge

Prepared By:

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